

To the FCC Commission:

We need detailed data and analysis of the following issues before you

dismantle the few remaining limits and caps on media ownership:

-- If we eliminate our remaining media concentration rules, what will be the effect on the localism, diversity, and independence that have traditionally undergirded the democratic process? This fundamental and obvious question remains unaddressed.

-- What effects have recent mergers, radio consolidation, and TV duopolies had on the personnel and resources devoted to news, public affairs, and public service programming, and on the output of such programming? Will eliminating our rules result in a crisis in these areas?

-- Do newspapers and co-owned broadcast stations carry similar viewpoints more frequently than independent newspapers and broadcast stations? If so, and if we eliminate our rules, what are the implications for democracy and debate in America?

-- How do consolidation and co-ownership affect the media's focus on issues important to minorities and to the objective of diversity?

-- What are the effects of new technologies on the consolidation issue?

Digital broadcast, for example, will provide existing station owners with the ability to multi-cast several programs simultaneously. This alone augments their influence. What are the effects of this on competition?

Why Ownership Rules Matter

-- Impact on democracy -- If one company can own a town's local newspaper, TV and radio stations, if national TV networks can merge their news operations, if nothing limits the size of these huge corporations, we will get a more limited view on the news. Issues that matter can be more easily buried or distorted, and differing viewpoints will not be heard.

-- Diversity of creativity, art, culture, vision -- We don't need censorship to combat violent, sexist, racist, commercialized, unoriginal media. We need access for independent producers to offer alternatives. We need choices -- not more channels from the same owners.

-- Labor rights and minority ownership -- Fewer media companies means fewer jobs for media workers. Media ownership by people of color and women is down and getting worse as a result of consolidation.

-- Localism and community -- Without local owners and local newsrooms, media are disconnected from communities. The bigger these companies get, the less likely they are to cover local

issues or feature local artists.

-- Corporate accountability -- With the recent wave of corporate malfeasance (especially in the media sector) we need watchdogs now more than ever.

-- The Fate of Journalism -- Ownership consolidation means fewer foreign news bureaus, investigative reporters and resources for journalists.

Sincerely,
Marcia Burkart